

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

First-Class Mail and Periodicals  
Service Standard Changes, 2021

Docket No. N2021-1

STEVE HUTKINS  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
UNITED STATES POSTAL SERVICE

(May 17, 2020)

Pursuant to 39 C.F.R. § 3010.311, I hereby submit institutional interrogatories and requests for production of documents to United States Postal Service.

The instructions contained in my interrogatories to USPS, SH/USPS-1-1-6, are incorporated herein by reference.

Any part of these interrogatories may be re-directed to a Postal Service witness, as necessary.

Respectfully submitted,

Dated: May 17, 2021

Steve Hutkins  
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SH/USPS-1-1. Please refer to the table in the 10-Year Strategic Plan, “Delivering for America: Our Vision and Ten-Year Plan to Achieve Financial Sustainability and Service Excellence,” p. 46, Figure 28, “The Postal Service Base Case 10 Year Financial Projection.” Please refer to the row for “Total Mail and Package Volume.”

- a. Please confirm that these volume projections do not factor in the volume projected to be lost due to possible use of the new price cap on Market Dominant products, as approved by the PRC.
- b. Please confirm that these volume projections do not factor in the volume projected to be lost due a change in service standards (as discussed in the testimony of Mr. Thress).
- c. If (a) or (b) is not confirmed, please explain why the “Base Case” incorporates assumptions that are associated with the USPS initiatives that are incorporated in Figure 35.

SH/USPS-1-2. Please refer to the table in the Strategic Plan, p. 51, Figure 35, “10-Year Delivering for America Projected Profit and Loss Statement – With USPS Initiatives.”

- a. Please provide annual mail and package volume projections with USPS initiatives, similar to the row for volumes in Table 28.
- b. Please confirm that the projections for “Market Dominant Revenue” and “Competitive Revenue” factor in the volume projected to be lost due to possible use of the new price cap on Market Dominant products. If not confirmed, please explain.
- c. Please confirm that these revenue projections factor in the volume projected to be lost due a change in service standards. If not confirmed, please explain.

SH/USPS-1-3. Please provide a table showing projected volumes and revenues for 2021 through 2030, disaggregated for Competitive and Market Dominant, and within Market Dominant, for First Class, Marketing Mail, and Periodicals, both with and without factoring in the impacts of using the new price cap and changing service standards.

SH/USPS-1-4. Please discuss the view that lowering service (both in terms of the standards and average delivery time) while maintaining the same prices effectively raises prices.

SH/USPS-1-5. Please provide a copy of the pages of the TARL/TISR technical report list index for the subject heading “Service Standards.”

SH/USPS-1-6. Please provide a copy of the title page and table of contents for each of the TARL/TISR technical reports categorized under the heading “Service Standards” in that report index.